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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

\*\*\*\*\*

UNITED STATES OF AMERICA,

Plaintiff,

v.

JEFFREY A. MARTINEZ, individually, and as  
Trustee of the Martinez Family Trust; DOLORES  
M. MARTINEZ, individually and as Trustee for  
the Martinez Family Trust; THE MARTINEZ  
FAMILY TRUST; MARTINEZ &  
ASSOCIATES, INC. (NV20041370692);  
MARTINEZ & ASSOCIATES INC.  
(NV20181033912); SIERRA MORTGAGE  
CORPORATION; FIDELITY NATIONAL  
TITLE; CHASE MORTGAGE COMPANY; JP  
MORGAN CHASE BANK NATIONAL  
ASSOCIATION; NEVADA MORTGAGEE  
ASSISTANCE COMPANY, LLC; THE COOPER  
CASTLE LAW FIRM, LLP; RHODES RANCH  
ASSOCIATION; and REPUBLIC SILVER  
STATE INC., DBA, REPUBLIC SERVICES,

Defendants.

Case No.: 2:19-cv-01986-GMN-DJA

**JOINT MOTION TO EXTEND DEADLINE  
FOR DEFENDANTS JPMORGAN CHASE  
BANK, N.A., AND CHASE MORTGAGE  
COMPANY TO RESPOND TO PLAINTIFF'S  
COMPLAINT (SECOND REQUEST)**

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1 IT IS HEREBY AGREED by and between Plaintiff UNITED STATES OF AMERICA  
2 (hereafter "Plaintiff") through its attorney E. Carmen Ramirez, and Defendants JPMORGAN  
3 CHASE BANK, N.A. and CHASE MORTGAGE COMPANY, (collectively "Chase") through  
4 their attorney Justin T. Grim, Esq., that Defendants Chase may have additional time within  
5 which to answer or otherwise respond to Plaintiff's Complaint. Specifically, the parties have  
6 agreed to extend Defendants' time to respond. Defendants may answer or otherwise respond to  
7 Plaintiff's Complaint on or before February 21, 2020.

8 The parties further agree that good cause exists for this extension. The amended response  
9 deadline allows Defendants to continue investigating the matter and for the parties to continue  
10 their discussions regarding the dispute.

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1 Therefore, Plaintiff and Chase hereby jointly move for an order extending Chase's deadline  
2 to answer or otherwise respond to Plaintiff's Complaint on or before February 21, 2020.

3 Signed this 29<sup>th</sup> day of January, 2020

Signed this 29<sup>th</sup> day of January, 2020

4 McCALLA RAYMER LEIBERT  
5 PIERCE, LLP

RICHARD E. ZUCKERMAN  
Principal Deputy Assistant Attorney General


6 By: /s/ Justin T. Grim  
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By: /s/E. Carmen Ramirez  
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13 Of Counsel:

14 NICHOLAS A. TRUTANICH  
15 United States Attorney

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17 **IT IS SO ORDERED:**

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21 Daniel J. Albregts  
United States Magistrate Judge

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23 Dated: January 31, 2020.  
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